

ATTACHMENT 2

Members

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Twin City (updated March 23, 2000)

PO Box 980

Twin City, GA

30471-0980

Phone: (912) 763-2695

Fax: (912) 763-3727

Pop: 1,466 ('90 Census)

RDC: Central Savannah River
Area

State Development Region: 9

County: Emanuel

Senate: Paul Coverdell, Max Cleland

Congressional District: 10

State Senate District: 20

State House District: 144

[View Map](#)[More on](#)[Twin City](#)[in](#)[Local Area](#)

Elected Officials

Mayor: Mr. Johnny E. Baker

Council Member: Mr. George E. Archer,
Jr.

Council Member: Mr. Artie Fields

Council Member: Mr. Jimmy Greenway

Council Member: Mr. John William
Turner

Appointed Officials

City Clerk: Ms. Sylvia Bennett

Area Economic Development Agencies

Swainsboro Development Center

Commerce

124 N. Main St.

Swainsboro, GA 30401

Telephone: (912) 327-7400

Fax Number: (912) 327-7400

Area Newspapers

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Counterproposal to MM Doc 00-18
RM-9790
by Multi-service Corp.
Statesboro, Georgia
March 2000

This rule making request is filed on behalf of Multi-service Corp., ("MSC"), licensee of WPMX, Statesboro, Georgia and is filed mutually exclusive with MM Docket 00-18, RM-9790 filed by Bullie Broadcasting Corporation, ("Bullie"). While the Bullie proposal creates first service to the two towns of Pembroke and Willacoochee, the MSC counterproposal creates first service to Pulaski, Twin City, East Dublin and Willacoochee as well as expanded service at Cordele and Montezuma (all Georgia towns). Footnote one of MM Docket 00-18 informs us that:

"The licensee of Station WDMG-FM, Jumbo Thing, Inc. (Jumbo Thing"), has consented to the change of its station's community of license and change of transmitter site. Therefore, an Order to Show Cause is not necessary."

MSC also supports the new Willacoochee service and has based its counterproposal on the previously requested Willacoochee reallocation and site change.¹

Exhibit #1 is a flowchart of the MSC proposal. It assumes Jumbo Thing has changed its city of license from Douglas to Willacoochee. First, MSC requests that WPMX, Channel 275C3 at Statesboro be ordered to Channel 257C3. This would be a lateral channel change at the current WPMX site. Because there

¹ Willacoochee reference coordinates: 31° 20' 27", 83° 24' 30".

would be no change of site, height or power and only a change of channel, no further demonstration of the city grade coverage of Statesboro is being made.

WPMX currently serves Statesboro with the 70 dBu signal.

Upon WPMX vacating Channel 275C3, Channel 275A is open to be allocated as first service to the town of Pulaski.² Pulaski has a population of 264 persons and is in Candler County. Exhibit #3A is the Pulaski allocation study and Exhibit #3B is the demonstration of city grade service to Pulaski from the proposed allocation site.

With WPMX moved from Channel 275C3, Channel 276C3 is available to be allocated to East Dublin (see Exhibits #4A and 4B).³ Lacom Communications, Inc. ("Lacom") filed a counterproposal to MM Docket 99-199 to request first service to East Dublin on Channel 251C3 and simultaneously that Channel 251A be removed from Swainsboro and WELT (formerly WJAT) be ordered to 251C3 at East Dublin. This instant proposal allows Lacom to have its desired Class C3 service at East Dublin (but on Channel 276C3) and removes the mutual exclusivity of the Lacom Counterproposal at East Dublin. It is thought that this instant counterproposal is a resolution to the conflicts between the proposal and counterproposal in Docket 99-199.

² Pulaski reference coordinates: 32° 26' 43", 81° 58' 07". 60 dBu area: 2,459.65 sq. km. 60 dBu population: 51,973.

³ East Dublin reference coordinates: 32° 31' 58", 82° 55' 41". 60 dBu area: 4,688.37 sq. km. 60 dBu population: 63,542.

Additionally, when Lacom is ordered to Channel 276C3 at East Dublin, Channel 251A is available for allocation as first service to Twin City (see Exhibits #5A-5B)⁴. The town of Twin City is in Emanuel County and has a population of 1,466 persons.

Morgan Dowdy is the proponent of RM 9685, a request to allot channel 253A to Soperton as that community's second FM station. Although this Soperton request is not mutually exclusive with the original Docket 99-199, it is mutually exclusive with the Lacom counterproposal to Docket 99-199. When Lacom is ordered to Channel 276C3 at East Dublin, the Morgan Dowdy proposal at Soperton is also removed from being mutually exclusive and allows a second FM allotment at Soperton.

The original Docket 99-199 requests upgraded service at Cordele and Montezuma as well as a lateral move of frequency at Hawkinsville. The entire original proposal of Docket 99-199 is thought to be grantable when Lacom at East Dublin is ordered to Channel 276C3. No duplication of exhibits is being made regarding the Cordele, Montezuma and Hawkinsville proposal (Docket 99-199) since that stands as filed.

⁴ Twin City reference coordinates: 32° 32' 03", 82° 16' 51". 60 dBu area: 2,482.02 sq. km. 60 dBu population: 27,861.


SUMMARY

It is requested that the following changes in the Table of Allotments be made

City	Present	Proposed
Douglas	258C1, 294C1	294C1
Willacoochee	None	258C1
Statesboro	220A, 261C2 275C3	220A, 261C2 257C3
Pulaski	None	275A
East Dublin	None	276C3
Swainsboro	251A, 263A	263A
Twin City	None	251A
Cordele	212A, 252A	212A, 236C3
Montezuma	236A	280C3
Hawkinsville	280C3	252C3
Soperton	291A	253A, 291A

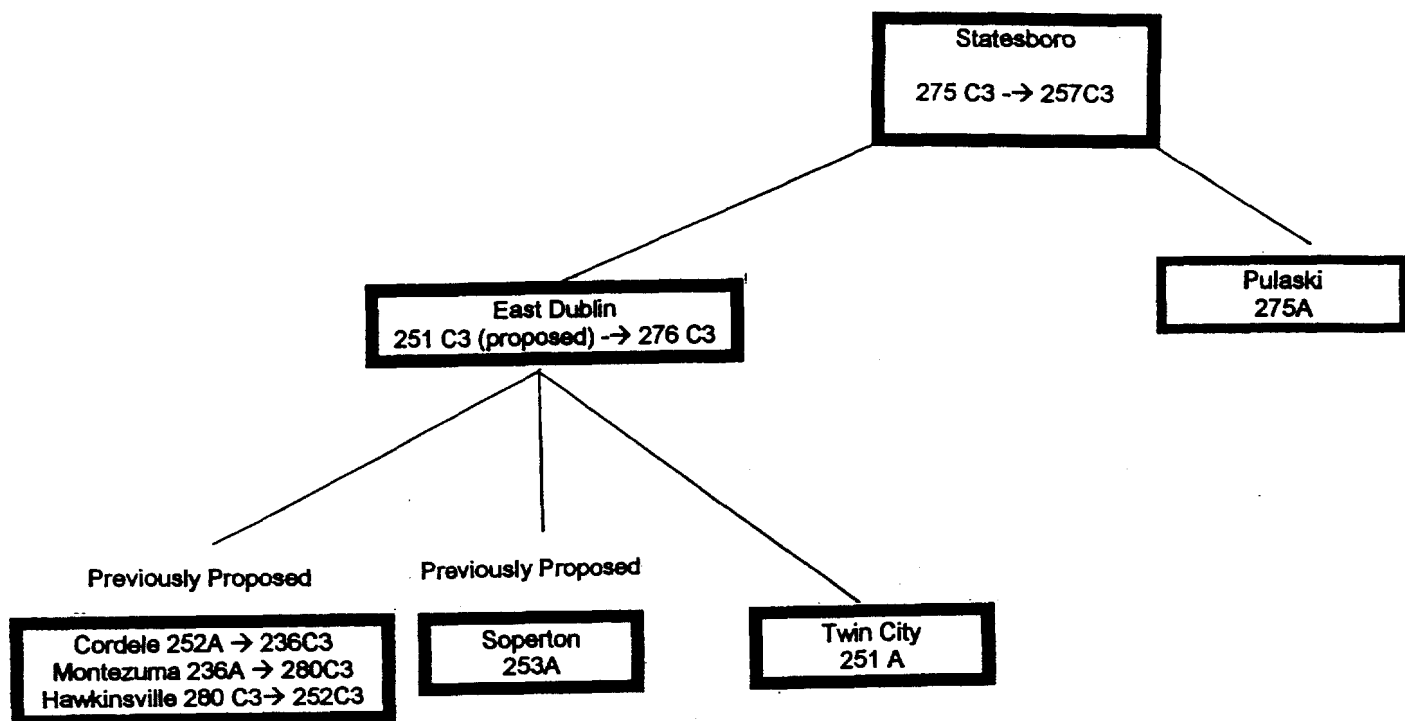
When allocated, Multi-service Corp. states its intention to file for the new facilities at Twin City and Pulaski as well as file the forms necessary to change the WPMX frequency from Channel 275C3 to Channel 257C3.

All information contained herein is thought to be true and correct to the knowledge of the undersigned.

A handwritten signature in dark ink, appearing to read "Clifton G. Moor", is written over a horizontal line.

Clifton G. Moor
Technical Consultant to
Multi-service Corp.

March 20, 2000



Flowchart

EXHIBIT #1
Counterproposal to MM Doc. 00-18
RM-9790
 by Multi-service Corp.
 Statesboro, Georgia
 March 2000

BROMO BROADCAST
 COMMUNICATIONS TECHNICAL CONSULTANTS

Searching at WPMX Site
Statesboro Georgia

REFERENCE
32 26 43 N
81 58 07 W

CLASS = C3
Current Spacings

DISPLAY DATES
DATA 03-17-00
SEARCH 03-19-00

----- Channel 257 - 99.3 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
WDMGFM LIC	258C1	Douglas	GA	131.09	217.6	144.0	-12.91
WDMGFM CP	258C1	Douglas	GA	131.55	217.8	144.0	-12.45
WBAWFM LIC	256C3	Barnwell	SC	103.44	33.2	99.0	4.44
WAYS LIC	256C1	Macon	GA	153.13	283.4	144.0	9.13
WAYS.A APP	256C1	Macon	GA	155.20	289.3	144.0	11.20
WKXCFM LIC	258C2	Aiken	SC	133.16	1.6	117.0	16.16
WYKZ LIC	254C1	Beaufort	SC	97.75	97.2	76.0	21.75
WYKZ LIC	254C1	Beaufort	SC	97.83	97.4	76.0	21.83
WHBZ LIC	259C	Port Royal	SC	140.50	90.8	96.0	44.50
WSNTFM LIC	260A	Sandersville	GA	98.19	306.9	42.0	56.19
WQIKFM AUX	256C	Jacksonville	FL	236.15	173.6	176.0	60.15
WQIKFM LIC	256C	Jacksonville	FL	243.55	170.9	176.0	67.55
WMOC LIC	204C2	Lumber City	GA	88.48	229.8	17.0	71.48

\$73.207 Allocation Study

EXHIBIT #2
Counterproposal to MM Doc. 00-18
RM-9790
by Multi-service Corp.
Statesboro, Georgia
March 2000

BROMO BROADCAST
TECHNICAL CONSULTANTS
COMMUNICATIONS

Searching at Pulaski Reference Site
Pulaski Georgia

REFERENCE
32 26 43 N
81 58 07 W

CLASS = A
Current Spacings

DISPLAY DATES
DATA 03-17-00
SEARCH 03-19-00

----- Channel 275 - 102.9 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
WPMX	LIC 275C3	Statesboro	GA	0.00	0.0	142.0	-142.00
RADD	ADD 276C3	East Dublin	GA	90.70	276.4	89.0	1.70
WGZO.C	CP 276C3	Parris Island	SC	98.33	90.3	89.0	9.33
WMXQ	LIC 275C	Jacksonville	FL	243.55	170.9	226.0	17.55
WBHCFM	LIC 276A	Hampton	SC	90.72	60.5	72.0	18.72
WBHCFM	CP 276A	Hampton	SC	90.72	60.5	72.0	18.72
WYSC	LIC 274A	Mcrae	GA	94.86	243.1	72.0	22.86
WIGL	LIC 275A	Orangeburg	SC	148.13	39.8	115.0	33.13
WIGL.C	CP 275A	Orangeburg	SC	148.13	39.8	115.0	33.13
WVRK	LIC 275C	Columbus	GA	264.84	267.8	226.0	38.84
WFXAFM	LIC 276A	Augusta	GA	117.01	1.6	72.0	45.01
WWSN	LIC 277C	Waycross	GA	142.94	180.1	95.0	47.94
WAJY	LIC 274A	New Ellenton	SC	122.46	14.6	72.0	50.46
WAJY.C	CP 274A	New Ellenton	SC	122.46	14.6	72.0	50.46
WPMA	LIC 274A	Sparta	GA	136.41	315.3	72.0	64.41
WPMA.C	CP 274A	Sparta	GA	136.41	315.3	72.0	64.41
WPEHFM	LIC 221A	Louisville	GA	74.48	328.0	10.0	64.48
WBGA	LIC 273C1	Waycross	GA	142.94	180.1	75.0	67.94

§73.207 Allocation Study

EXHIBIT #3A
Counterproposal to MM Doc. 00-18
RM-9790
by Multi-service Corp.
Statesboro, Georgia
March 2000

BROMO BROADCAST
TECHNICAL CONSULTANTS
COMMUNICATIONS

Searching at East Dublin Reference Site

REFERENCE
32 31 58 N
82 55 41 W

CLASS = C3
Current Spacings

DISPLAY DATES
DATA 03-17-00
SEARCH 03-19-00

----- Channel 276 - 103.1 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
WPMX	LIC 275C3	Statesboro	GA	90.70	95.9	99.0	-8.30
WVRK	LIC 275C	Columbus	GA	175.67	262.9	176.0	-0.33
WFXAFM	LIC 276A	Augusta	GA	141.88	40.5	142.0	-0.12
WWSN	LIC 277C	Waycross	GA	177.46	149.2	176.0	1.46
WVKX	LIC 279A	Irwinton	GA	45.44	328.1	42.0	3.44
WVKX.C	CP 279A	Irwinton	GA	45.44	328.1	42.0	3.44
WYSC	LIC 274A	Mcrae	GA	53.09	173.6	42.0	11.09
WVEE	LIC 277C	Atlanta	GA	189.09	316.5	176.0	13.09
WLCGFM	LIC 273A	Warner Robins	GA	69.85	273.8	42.0	27.85
WBHCFM	LIC 276A	Hampton	SC	172.64	77.9	142.0	30.64
WBHCFM	CP 276A	Hampton	SC	172.64	77.9	142.0	30.64
WGZO.C	CP 276C3	Parris Island	SC	188.76	92.7	153.0	35.76
WBMZ.A	APP 279A	Metter	GA	84.49	99.9	42.0	42.49
AVAC	VAC 279A	Metter	GA	85.01	99.9	42.0	43.01
WPMA.C	CP 274A	Sparta	GA	86.83	355.5	42.0	44.83
WPMA	LIC 274A	Sparta	GA	86.83	355.5	42.0	44.83
WMKS	LIC 222A	Macon	GA	71.73	292.2	12.0	59.73
WULS	LIC 279A	Broxton	GA	105.03	177.2	42.0	63.03
WRIXFM	LIC 276A	Honea Path	SC	212.96	9.6	142.0	70.96

§73.207 Allocation Study

EXHIBIT #4A
Counterproposal to MM Doc. 00-18
RM-9790
by Multi-service Corp.
Statesboro, Georgia
March 2000

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COMMUNICATIONS
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TECHNICAL CONSULTANTS

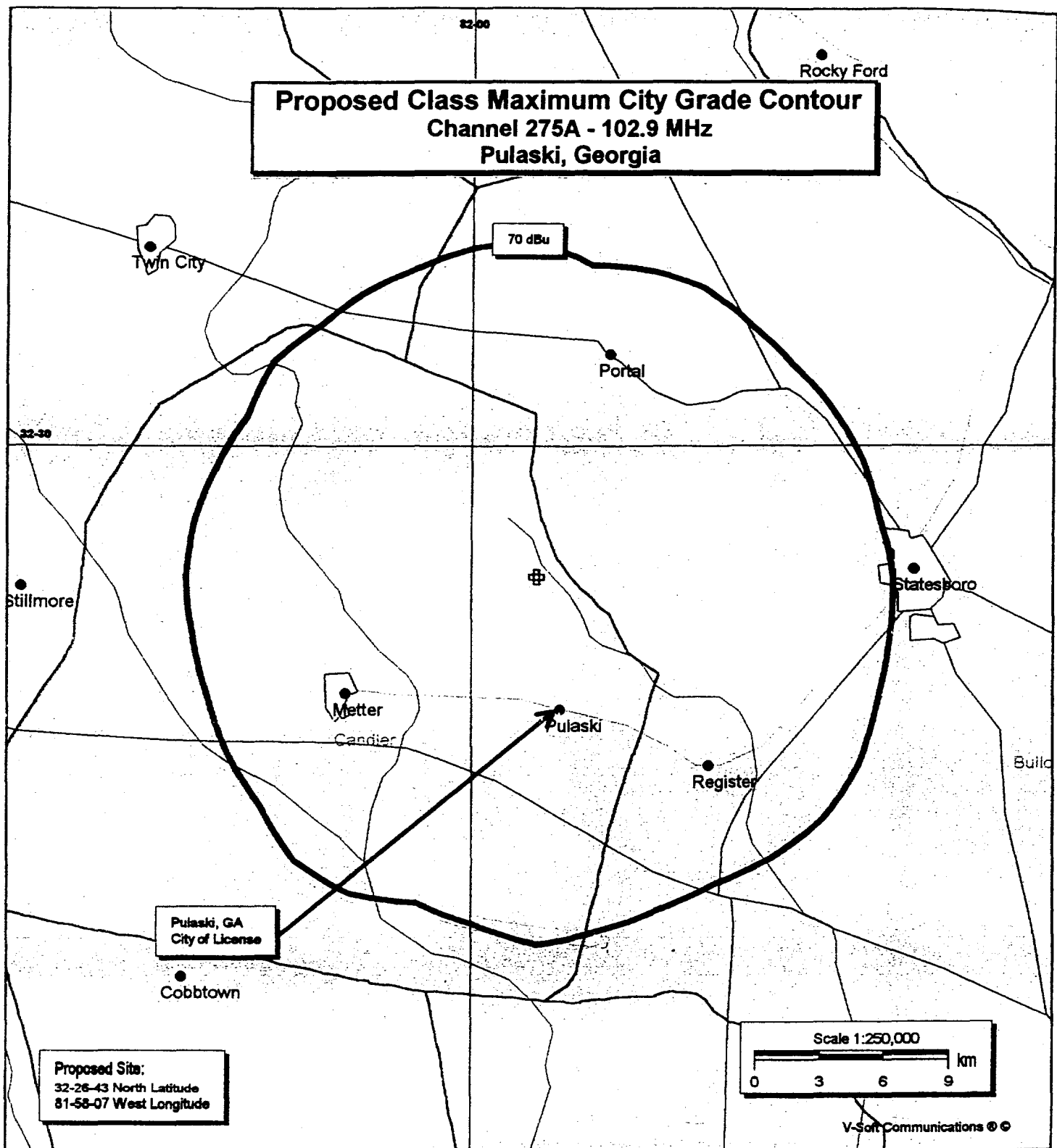


EXHIBIT #3B
Counterproposal to MM Doc. 00-18
RM-9790
by Multi-service Corp.
Statesboro, Georgia

Bromo Communications, Inc.
Atlanta, Georgia
March 2000

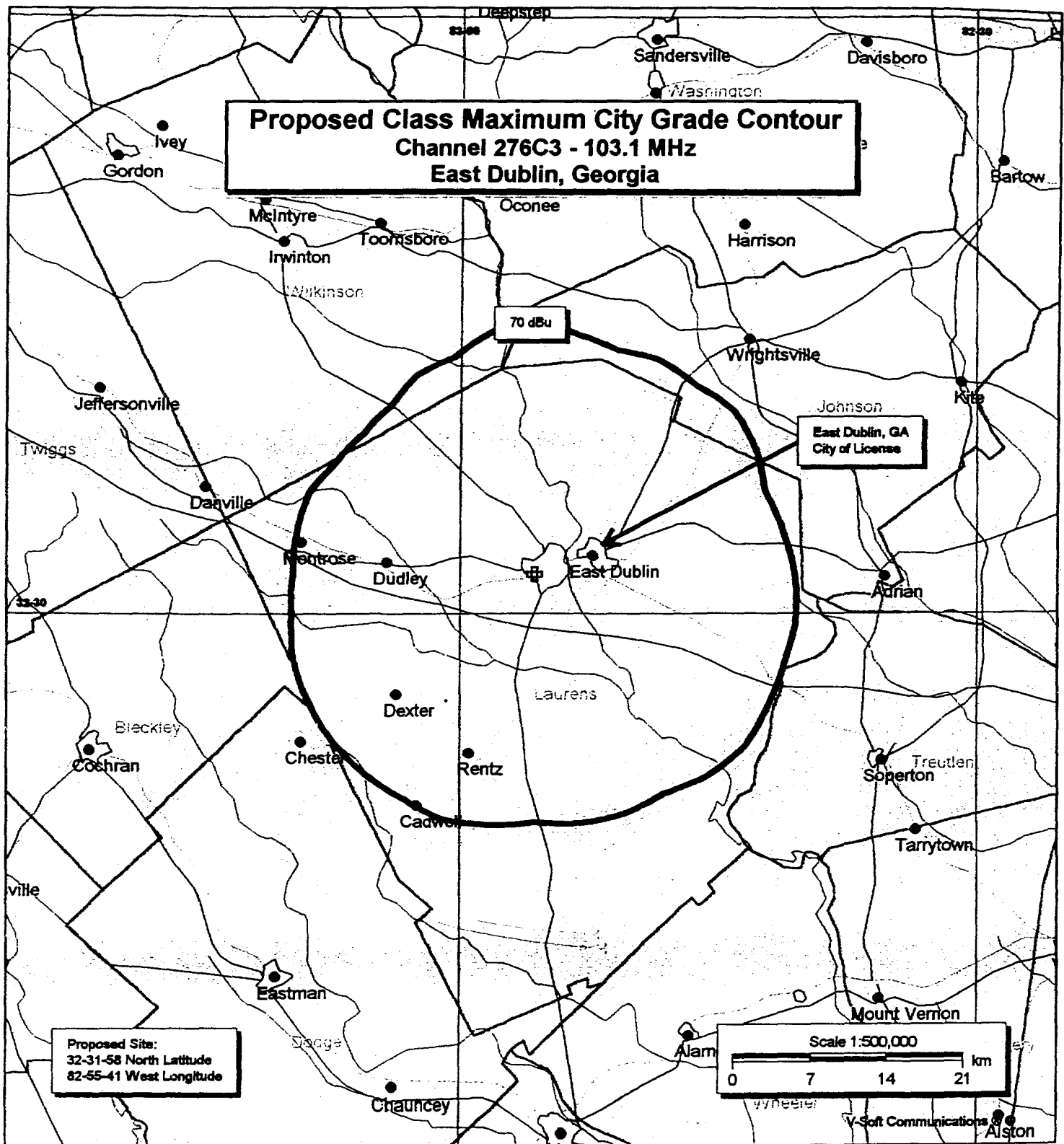


EXHIBIT #4B
Counterproposal to MM Doc. 00-18
RM-9790
by Multi-service Corp.
Statesboro, Georgia

Bromo Communications, Inc.
Atlanta, Georgia
March 2000

Searching at Twin City Reference

REFERENCE
32 32 03 N
82 16 51 W

CLASS = A
Current Spacings

DISPLAY DATES
DATA 03-17-00
SEARCH 03-20-00

----- Channel 251 - 98.1 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
WJATFM	LIC 251A	Swainsboro	GA	9.49	307.0	115.0	-105.51
RDEL	DEL 251A	Swainsboro	GA	9.49	307.0	115.0	-105.51
RADD	ADD 251C3	East Dublin	GA	39.72	273.9	142.0	-102.28
WIIZ	LIC 250C2	Blackville	SC	105.58	52.1	106.0	-0.42
RADD	ADD 253A	Soperton	GA	30.60	221.6	31.0	-0.40
WGCO	LIC 252C1	Midway	GA	134.16	139.5	133.0	1.16
WTCQ	LIC 249A	Vidalia	GA	37.81	202.8	31.0	6.81
WPEK	LIC 251C	Seneca	SC	247.66	344.9	226.0	21.66
RADD	ADD 252C3	Hawkinsville	GA	113.57	255.9	89.0	24.57
WSLT	LIC 252A	Clearwater	SC	110.39	20.0	72.0	38.39
WYBB	LIC 251C2	Folly Beach	SC	209.64	85.4	166.0	43.64
WIBBFM	LIC 250C3	Fort Valley	GA	138.73	272.0	89.0	49.73
WYKZ	LIC 254C1	Beaufort	SC	128.24	99.8	75.0	53.24
WYKZ	LIC 254C1	Beaufort	SC	128.33	99.9	75.0	53.33
WUFFFFM	LIC 248A	Eastman	GA	94.69	249.0	31.0	63.69

§73.207 Allocation Study

EXHIBIT #5A
Counterproposal to MM Doc. 00-18
RM-9790
by Multi-service Corp.
Statesboro, Georgia
March 2000

BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS

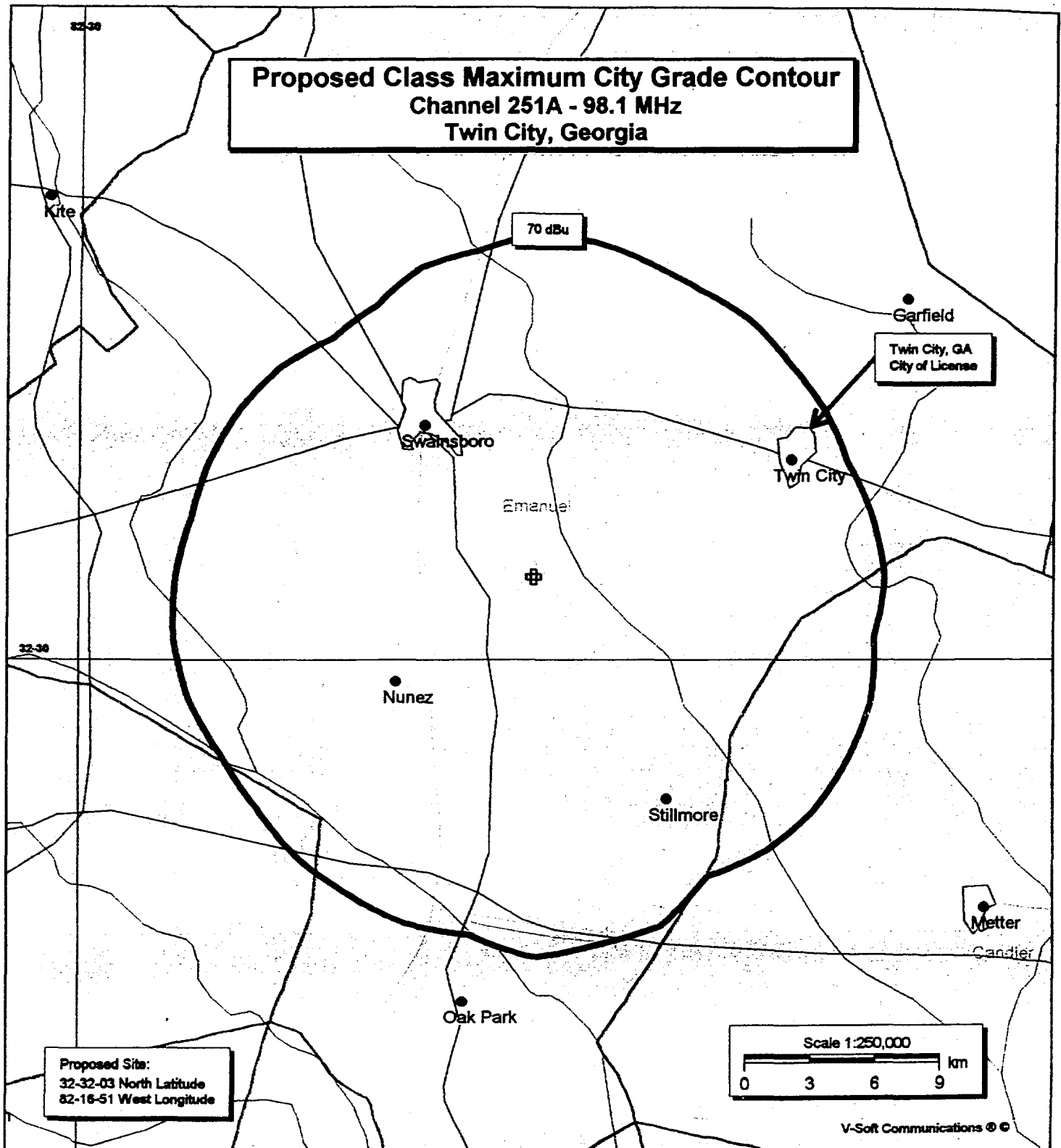
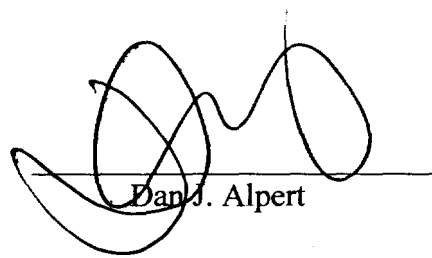


EXHIBIT #5B
Counterproposal to MM Doc. 00-18
RM-9790
by Multi-service Corp.
Statesboro, Georgia
Bromo Communications, Inc.
Atlanta, Georgia
March 2000

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that the foregoing document has been sent to the following parties via First Class Mail, postage prepaid:

J. Geoffrey Bentley, P.C.
P.O. Box 807
Herndon, VA 20172-0807

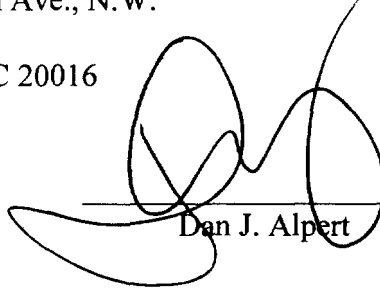


Dan J. Alpert

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that on March 23, 2000 the foregoing document is being served by First Class Mail, postage prepaid, to the following persons:

Christopher D. Imlay, Esq.
Booth Freret Imlay & Tepper, P.C.
5101 Wisconsin Ave., N.W.
Suite 307
Washington, DC 20016



Dan J. Alpert